

**PL Sum. J.**

**Ex. 67**

**AFFIDAVIT OF BRENDA CONNER**

COUNTY OF GWINNETT  
STATE OF GEORGIA

1. My name is Brenda Conner I am more than twenty-one years of age, competent to testify, have no legal or mental disability and have personal knowledge of the facts stated herein. I freely give this affidavit for use in this case.
2. I worked at the Red Roof Inn at 2200 Corporate Plaza, Smyrna, Georgia, 30080 ("Red Roof Inn") as a housekeeper the entire duration of my employment. I was employed by Red Roof Inns, Inc. as a housekeeper from the late 1990s through early 2000s.
3. I began working for Varahi Hotel, LLC around February 2013. I was fired by Bob Patel in 2016. I was later rehired by Bob Patel in 2019 and quit in 2020.
4. While at the Red Roof Inn, I worked the day shift.
5. Crime, especially sex trafficking, prostitution and drugs was rampant at the Red Roof Inn.
6. During all my time working at the Red Roof Inn it was well known by myself and other employees that open prostitution and sex trafficking occurred at the Red Roof Inn.
7. Girls who were trafficked at the hotel hung over the balconies with very little clothing and waited on johns outside their rooms.
8. On average day, during all the years I worked at the Red Roof Inn, there were multiple different pimps working at the Red Roof Inn each day.
9. Some of those pimps controlled a few girls in a single room or two rooms and some only had only one girl.
10. On average there were 10 girls being sold for sex each day out of this hotel. These young girls would see men all day.
11. On any given day there could be as many as 100 buyers at the hotel.
12. Most of the activity was in the back. I would see men drive into the hotel in Mercedes, Audis, BMWs, and Cadillacs and park. Men would get out of the cars and go into a room for a short period of time and then leave. This would happen all day long. These types of nice cars were not what guests who stayed at the hotel normally drove.
13. Prostitution and drug activity often made up the majority (50% or more) of the guests at the Red Roof Inn.
14. Many girls who were trafficked stayed at the Red Roof Inn more than a week at a time.
15. Buyers came to the Red Roof Inn for sex all day every day of the week.
16. There were often incidents of violence at the Red Roof Inn, including around January 11, 2015, when someone pulled a knife on a girl.
17. I would interact with some of the sex trafficking victims. I told a couple about a safehouse for teenagers near my home.
18. I never received any training regarding safety, security, or sex trafficking from Varahi Hotel.
19. Some girls being trafficked at the Red Roof Inn were clearly and noticeably under the age of 18. I often saw pimps controlling young girls and the pimps would not let the young girls talk to anyone else and they would do the talking for them. Some of these young girls stayed at the Red Roof Inn for a month or more.
20. Pimps and girls being sold for sex frequently requested numerous towels daily.  
Housekeeping regularly found rooms in disarray with excessive condoms and drug items.

When cleaning rooms and making the beds I had to be careful with my hands because there was often drug items like needles under the sheets of the bed.

21. When Varahi Hotel owned the Red Roof Inn ignored guest complaints. Varahi Hotel's policy was to avoid paying a refund at all costs.
22. Varahi Hotels never addressed these complaints about drug and prostitution activity with the staff or attempted to change anything at the hotel as a result of the complaints and illegal activity.
23. The above facts were well known to myself and other Varahi employees with whom I frequently discussed these facts with at work.
24. One of the young victims of sex trafficking I saw several times at the Red Roof Inn is the girl whose picture is attached as Exhibit 1. I saw this girl walking around the hotel and talking with other young victims of sex trafficking.
25. Another victim of sex trafficking I saw at the Red Roof Inn is the girl whose picture is attached as Exhibit 2.
26. Another young victim of sex trafficking I saw at the Red Roof Inn is the girl whose picture is attached as Exhibit 3.
27. Another victim of sex trafficking I saw at the Red Roof Inn is the girl whose picture is attached as Exhibit 4.
28. One of the pimps I knew of that worked out of the Red Roof Inn was the man whose picture is attached as Exhibit 5, who I knew as "Ant." He had a room right above the front office of the hotel where he trafficked girls.
29. I currently work at the Holiday Inn Express, located at 2855 Spring Hill Parkway, SE, Smyrna, GA. This hotel is a budget hotel near the Braves stadium similar to the Red Roof Inn. I have worked here for 2 years. We do not experience the type of open and obvious sex trafficking, prostitution, or drugs at this hotel that I saw at the Red Roof Inn because the hotel requires all employees to report any suspicious activities and call the police immediately. This is the opposite of my experience at the Red Roof Inn, where the hotel allowed pimps and prostitutes to operate freely, which brought more pimps and sex trafficking to the hotel.

This, the 18th day of April, 2022.

  
Brenda Conner

I, Teresa L Scarborough, a notary public for the county and state, certify that Brenda Conner, whose name is signed to the foregoing affidavit and who acknowledged before me on this day that, having read the contents of the foregoing affidavit, she executed the same voluntarily.

Sworn to and subscribed before  
me this 18 day of April, 2022


  
Notary Public



Exhibit 1

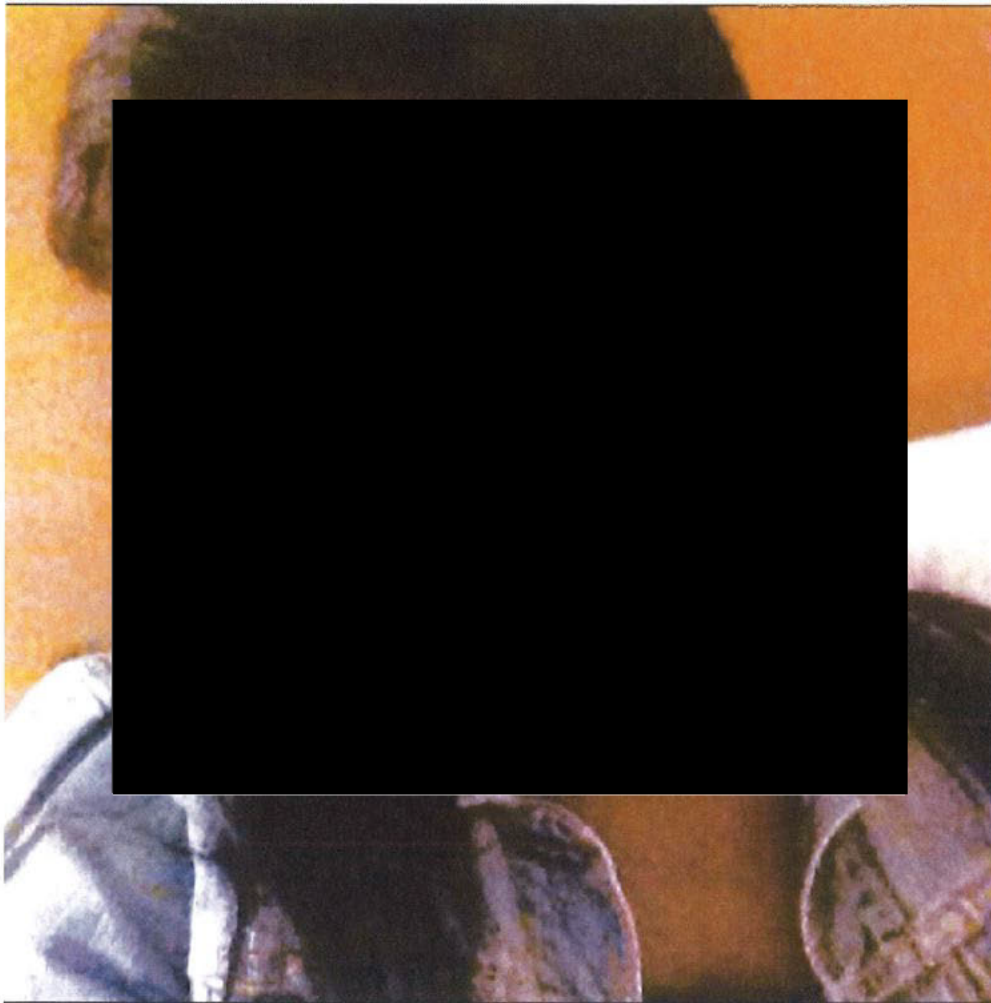


Exhibit 2



Exhibit 3

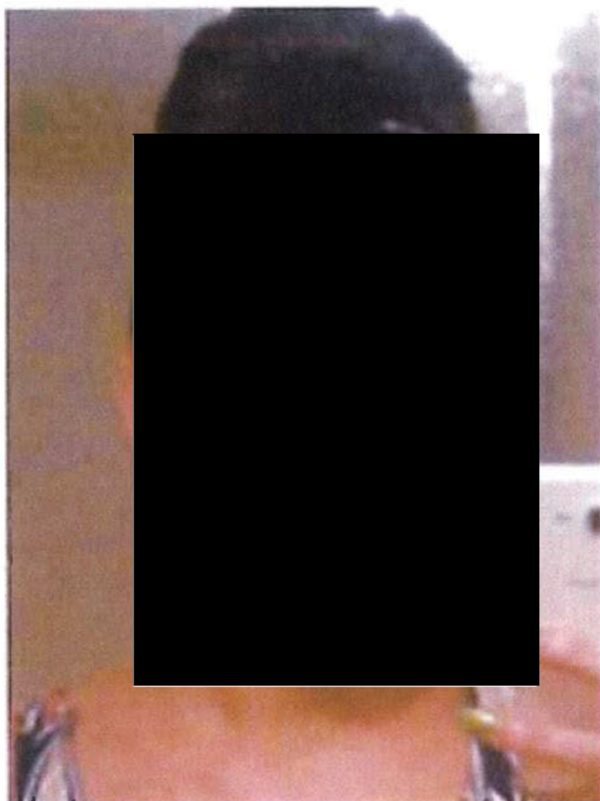


Exhibit 4

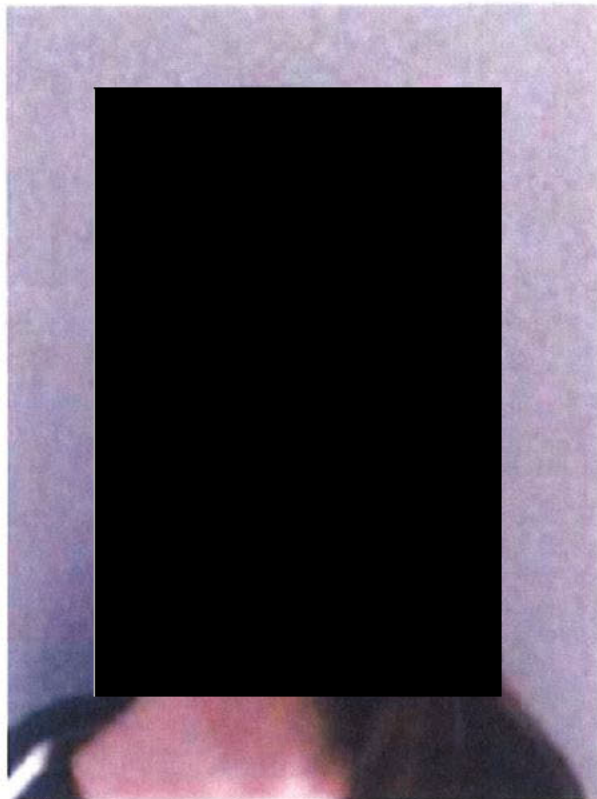


Exhibit 5

